

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

IN RE NATIONAL PRESCRIPTION
OPIATE LITIGATION

This document relates to:

“Track Three Cases”¹

**MDL No. 2804
Case No. 17-md-2804
Judge Dan Aaron Polster**

**JOINT MOTION FOR ORDER REVISING REMOTE DEPOSITION PROTOCOL
IN TRACK THREE CASES DUE TO COVID-19**

Plaintiffs and Pharmacy Defendants jointly move the Court to enter the proposed Order Revising the previously ordered Remote Deposition Protocol [Rec. Doc. 3409] due to COVID-19, attached as Exhibit A. In support of this Motion, the parties state as follows:

1. The parties have conferred and reached agreement on revising the remote deposition protocol for Track Three cases.
2. The revised remote deposition protocol provides more flexibility for the parties as it relates to the provision for transmitting hard copy exhibits.

¹ Track Three cases are *County of Lake, Ohio v. Purdue Pharma, L.P. et al.*, Case No. 1:18-op-45032 (N.D. Ohio) and *County of Trumbull, Ohio v. Purdue Pharma, L.P. et al.*, Case No. 1:18-op-45079 (N.D. Ohio).

DATED: December 21, 2020

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Joint Motion for Order Establishing a Revised Remote Deposition Protocol in Track One-B and Track Three Cases Due to COVID-19 was filed electronically this 21st day of December 2020. Notice of this filing will be sent by operation of the Court's electronic filing system to counsel of record for all parties as indicated on the electronic filing receipt. Parties and their counsel may access this filing through the Court's system.

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